

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

Civil No: 14 -

DISH NETWORK L.L.C, ECHOSTAR  
TECHNOLOGIES L.L.C., and  
NAGRASTAR LLC

Plaintiffs

v.

Edgardo Carrasquillo Reyes, a/k/a “Edgardo  
Carrasquillo”, “Ed Reyes”, “Frank Reyes”,  
“BluebirdPR” and “Bluebird” d/b/a  
Generation IKS,  
www.caribbean-systems.com  
and JOHN DOES 1-3

Defendant

DECLARATION OF AARON TESANOVICH IN  
SUPPORT OF PLAINTIFFS’ *EX PARTE*  
MOTIONS FOR TEMPORARY RESTRAINING  
ORDER, CIVIL SEIZURE/ IMPOUNDMENT  
ORDER, ORDER TO SHOW CAUSE, ORDER  
TEMPORARILY SEALING CASE, ORDER  
FOR ASSET FREEZE, AND ORDER FOR  
ACCOUNTING AND SUMMARIZATION OF  
OTHER DECLARATIONS

Aaron Tesanovich declares and says:

1. My name is Aaron Tesanovich.
2. I am making this declaration in support of the Plaintiffs’ Ex Parte Motions for Temporary Restraining Order, Civil Seizure/Impoundment Order, Order to Show Cause, Order Temporarily Sealing Case, Order for Asset freeze and Order for Accounting.
3. I was involved in satellite television piracy for approximately 12 years, including piracy of the satellite television programming offered by DISH Network LLC (“DISH”) and DIRECTV, LLC (“DIRECTV”) in the United States. Most recently, I was a re-seller of subscriptions for a private Internet Key Sharing (“IKS”) server operated by Gauravjit Gill (referred to herein as “Gill” or “G-MAN”) that permitted subscribers to obtain DISH’s encrypted satellite television programming (“DISH Programming”) without authorization from or payment to DISH. As

such I have personal knowledge of the matters to which I hereinafter depose. Where I do not have personal knowledge, I have stated the source of my information and verily believe it to be true.

*Arrangements with the Plaintiffs*

4. On November 1, 2011, Jerry Lee Gee ("Gee"), a representative of NagraStar LLC ("NagraStar"), along with counsel for DISH and NagraStar and two members of the Federal Bureau of Investigation ("FBI"), attended at my residence while I was at work.
5. On November 21, 2011, I entered into a Confidential Settlement Agreement with the Plaintiffs in settlement of the claims against me with respect to my involvement in satellite piracy (the "Confidential Settlement Agreement"). The terms of the settlement are confidential.
6. I agreed to a permanent injunction enjoining me from engaging in piracy in the future. I also agreed to provide information to the Plaintiffs about persons involved in piracy and to co-operate with the Plaintiffs with respect to any investigations. I also agreed that the information I provided would be complete and truthful, and that I would lose the benefit of the Confidential Settlement Agreement if the information I provided to the Plaintiffs were untrue.
7. Since I entered into the Confidential Settlement Agreement, I have had minimal involvement in the piracy community.

*Introduction to Satellite Television Piracy*

8. As a result of my work as an installer of DISH systems and a few DIRECTV systems that I did on my own, I became familiar with satellite television equipment. My involvement in satellite piracy began while I was a student at Georgia Southern. I developed an interest in piracy and largely taught myself how to "hack" satellite television access cards, program them with piracy software, and set up systems that could be used to obtain satellite television programming

supplied by DISH and DIRECTV for free. I started by modifying DISH and DIRECTV Access Cards and setting up pirated satellite television systems at a small charge for friends and family referred to me by word of mouth. I never operated a web site or started a business.

9. I also learned about piracy from the Internet. There are many web sites dedicated to piracy. Some of these web sites serve as forums for the exchange of information pertaining to piracy. Piracy forums may provide information on piracy methods and technologies, offer piracy software files for download, and host discussions on piracy topics. They thereby serve as a community for the exchange of information on piracy by both piracy dealers and their customers.
10. In 2004, I was a member of several piracy forums, including *dss-newbies.net* and *dssevolution.com*. I used the username "aaronwt6" and the e-mail address *aaronwt6@hotmail.com*. I continue to use this username up to the present time. To the best of my recollection, I have never used any other username or e-mail address on any piracy forums.
11. In 2004, I stopped engaging in DIRECTV piracy because, at that time, the DIRECTV access card became "secure" and impossible to hack. I shifted my focus exclusively to piracy of DISH Programming and the "hacking" of DISH Access Cards.
12. In 2004, I was also involved in selling equipment for satellite television piracy. I bought and sold DISH Receivers on eBay to supply to my customers and set up pirated systems for them. My customer base was local and remained limited to friends and family and word of mouth referrals.

*Dealings with Edgardo Carrasquillo*

13. In 2008 I met an individual online that I would later find out was Edgardo Carrasquillo, located in Puerto Rico. His contact information was:

Name:	Edgardo Carrasquillo
Address:	RR 6 BOX 9996, San Juan, PR 00926
Email:	<i>frankreyes@prtc.net</i> <i>Egy_pr@hotmail.com</i>
Ebay ID:	bluebirdpr
IKS System Name:	bluebird IKS

14. I met and interacted with Carrasquillo on the auction website eBay and on the satellite television piracy forum [www.dss-newbies.net](http://www.dss-newbies.net).
15. The nature of my interaction with Carrasquillo was regarding the piracy of DISH satellite transmissions, specifically pertaining to DISH Rom102 smartcards and IKS systems.
16. I chatted with Carrasquillo online on approximately 50 occasions. I have never met him. The extent of our interaction was on eBay, [www.dss-newbies.net](http://www.dss-newbies.net) and via MSN Messenger.
17. Here is an example of a chat log between myself and Carrasquillo on November 3, 2011, where we discuss DISH IKS piracy, exchanging smartcards, utilizing DISH receivers and modifying DISH receivers:

*11/3/2011 10:23:43 AM Aaron ED. Hey bud. Its Thursday again. You think we're in for more trouble this evening?*

*11/3/2011 10:24:17 AM ED. Aaron i se the sub here they was frezzen agin*

*11/3/2011 10:24:28 AM ED. Aaron as happens last week*

*11/3/2011 10:24:42 AM Aaron ED. Damn. Thats not good*

*11/3/2011 10:25:27 AM ED. Aaron what i doing is treing to make the exchance of the card s at 3;15 pm*

*11/3/2011 10:25:57 AM Aaron ED. Ah, gotcha*

*11/3/2011 10:26:10 AM Aaron ED. I hope are guys are prepared as well*

*11/3/2011 10:26:59 AM ED. Aaron cus ,se .i had few ird out and un plug ..and afther that happens i place back in and they are working with out a prtonblem*

*11/3/2011 10:27:34 AM ED. Aaron but they was connected all nigh till 10am that day and they rolls keys*



11/3/2011 10:27:34 AM Aaron ED. Cool. Were you still wanting me to read those tsops for you?  
 11/3/2011 10:28:46 AM ED. Aaron you know what i dd in some 301 ,exchance the card  
 11/3/2011 10:28:54 AM ED. Aaron for a virg one  
 11/3/2011 10:28:55 AM Aaron ED. Oh, ok  
 11/3/2011 10:29:23 AM Aaron ED. Just checking. You had mentioned having me read those for you and wasn't sure if you were sending.  
 11/3/2011 10:30:04 AM ED. Aaron .man i was so busy ..but i cach you this week ok  
 11/3/2011 10:30:37 AM Aaron ED. Sure thing. N/P  
 11/3/2011 10:30:42 AM Aaron ED. I certainly understand.  
 11/3/2011 10:31:54 AM ED. Aaron man .so busy re doing all the set up ..i still missing some states  
 11/3/2011 10:32:36 AM Aaron ED. I hear ya man. Its a full time job.  
 11/3/2011 10:33:38 AM ED. Aaron now it is !!  
 11/3/2011 10:33:52 AM ED. Aaron did you check the loggers  
 11/3/2011 10:34:07 AM ED. Aaron anything on that ??  
 11/3/2011 10:34:23 AM Aaron ED. I don't have anything like that myself  
 11/3/2011 10:34:27 AM ED. Aaron Season-Interface-Logger  
 11/3/2011 10:34:51 AM ED. Aaron I place aq order for 4 off them  
 11/3/2011 10:35:04 AM ED. Aaron hope we can do something withit  
 11/3/2011 10:35:20 AM Aaron ED. Nice. Hope it shows you something positive.  
 11/3/2011 10:36:13 AM ED. Aaron i let you know ..as soon arrive ..  
 11/3/2011 10:36:39 AM Aaron ED. Cool man. Look forward to hearing the news. Do that for sure.  
 11/3/2011 10:36:56 AM Aaron ED. If I hear anything positive on ours I'll pass the info your way.  
 11/3/2011 10:37:27 AM ED. Aaron ok.i had to run ..i be in toach  
 11/3/2011 10:37:32 AM Aaron ED. C ya

18. Carrasquillo and I were discussing the Bluebird IKS Server in this chat. Bluebird IKS is a service and server that he led me to believe he owned, sold subscriptions to, operated, maintained.
19. I believe that Edgardo Carrasquillo is running and maintaining an IKS server and is openly selling his services via word of mouth and on the Internet.
20. I had Carrasquillo's contact information from our interaction on Ebay. He purchased items from me and I shipped them to him at the address listed above.

*Full Disclosure*

21. In the interest of full disclosure:

- i. I never told Carrasquillo that I entered into the Confidential Settlement Agreement with the Plaintiffs.
- ii. Carrasquillo is not aware that I have provided my MSN chats with him to the Plaintiffs.
- iii. Carrasquillo is not a competitor of mine in this business or any other business.

I declare this 7<sup>th</sup> day of July, 2014 under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Mr. Aaron Tesanovich